

EXHIBIT L

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

WENDY HARRINGTON,

Plaintiff,

v.

DEUTSCHE BANK NATIONAL TRUST
COMPANY AS TRUSTEE FOR THE
SECURITIZED ASSET-BACKED
RECEIVABLES LLC TRUST 2007-HE1,
MORTGAGE PASS-THROUGH
CERTIFICATES SERIES 2007-HE1,

Defendant.

CIVIL ACTION NO. 1:19-cv-12320-DJC

DEFENDANT’S FIRST REQUEST FOR ADMISSIONS BY THE PLAINTIFF

Pursuant to the Federal Rules of Civil Procedure 36, Deutsche Bank National Trust Company, as Trustee for the Securitized Asset-Backed Receivables LLC Trust 2007-HE1, Mortgage Pass-Through Certificates Series 2007-HE1 (“Deutsche Bank as Trustee” or the “Defendant”), hereby requests that the Plaintiff, Wendy Harrington (“Plaintiff” or “Harrington”), respond to Defendant’s Request for Admissions within thirty (30) days.

INSTRUCTIONS

1. These Requests for Admissions are to be responded to in accordance with Rules 26 and 36 of the Federal Rules of Civil Procedure and Local Rule 26.5.
2. All requests contained herein must be responded to separately and fully in writing, under penalty of perjury, and any objections to any request contained herein must state the reason for such objection with sufficient particularity.
3. For the purposes of these requests, the singular form of a noun or a pronoun shall be considered to include within its meaning the plural form of a noun or pronoun so used, and vice-versa.

DEFINITIONS

As used in this document, unless otherwise noted, all words shall have the meanings given to them by: (i) the definitions included in this Section; (ii) the Federal Rules of Civil Procedure; and (iii) Local Rule 26.5.

Complaint: The term “Complaint” means the Complaint filed by the Plaintiff in the above-captioned matter on or about November 4, 2019.

Mortgage: The term “the Mortgage” means the mortgage on the Property granted by the Plaintiff to Mortgage Electronic Registration Services, Inc., dated August 31, 2006.

Mortgage Modification: The term “Mortgage Modification” means the mortgage modification agreement signed by you on or about May 7, 2012.

Note: The term “the Note” means the \$215,000.00 promissory note signed by the Plaintiff in favor of WMC Mortgage Corporation.

Property: The term “the Property” means the real property located at 4 Mercier Street, Dracut, Massachusetts.

You or Your: The term “You” or “Your” means the Plaintiff, Wendy Harrington, as identified in the caption of this matter, and each of his agents.

REQUESTS FOR ADMISSIONS

REQUEST NO. 1: On August 31, 2006, you borrowed \$215,000.00 from WMC Mortgage Corporation.

REQUEST NO. 2: Attached as Exhibit A is a true and accurate copy of the Note.

REQUEST NO. 3: You signed the Note.

REQUEST NO. 4: Your initials appear on pages 1 and 2 of the Note, and your signature appears on page 3.

REQUEST NO. 5: On August 31, 2006, you signed a mortgage.

REQUEST NO. 6: Attached as Exhibit B is a true and accurate copy of your Mortgage.

REQUEST NO. 7: You signed the Mortgage as security for the \$215,000.00 you borrowed on August 31, 2006.

REQUEST NO. 8: Your initials appear on pages 1-12 of the Mortgage.

REQUEST NO. 9: Your signature appears on page 13 of the Mortgage.

REQUEST NO. 10: Your initials appear on page 14 of the Mortgage, which contains the legal description of the property.

REQUEST NO. 11: You signed a Mortgage Modification on or about May 7, 2012.

REQUEST NO. 12: A true and accurate copy of the Mortgage Modification is attached as Exhibit C.

REQUEST NO. 13: When you signed the Mortgage Modification, you agreed that the Mortgage was a lien on the Property.

REQUEST NO. 14: When you signed the Mortgage Modification, you agreed that Deutsche Bank as Trustee is the holder of your Note and Mortgage.

REQUEST NO. 15: The Mortgage Modification required you to pay \$884.14 each month, beginning May 1, 2012.

REQUEST NO. 16: You did not pay \$884.14 each month beginning May 1, 2012, as required by the Modification Agreement.

[SIGNATURE PAGE FOLLOWS]

DEUTSCHE BANK NATIONAL TRUST
COMPANY AS TRUSTEE FOR THE
SECURITIZED ASSET-BACKED
RECEIVABLES LLC TRUST 2007-HE1,
MORTGAGE PASS-THROUGH
CERTIFICATES SERIES 2007-HE1

By: Its Attorneys

/s/ Kevin W. Manganaro

Hale Yazicioglu Lake, BBO #679480

Kevin W. Manganaro, BBO #690082

HINSHAW & CULBERTSON LLP

53 State Street, 27th Floor

Boston, MA 02109

Phone: 617-213-7000

Fax: 617-213-7001

E-mail: hlake@hinshawlaw.com

kmanganaro@hinshawlaw.com

Dated: April 20, 2020

CERTIFICATE OF SERVICE

I, Kevin W. Manganaro, hereby certify that on April 20, 2020 I served the foregoing document on counsel for the Plaintiff by email and first class mail as follows:

Wendy Harrington, *Pro Se*
4 Mercier Street
Dracut, MA 01826
Cocacapi@hotmail.com

/s/ Kevin W. Manganaro

Kevin W. Manganaro